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October 17, 2016

VIA HAND DELIVERY and EMAIL – FILED UNDER SEAL

The Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007
ForrestNYSDCChambers@nysd.uscourts.gov

Re: Krechmer v. Tantaros, et al., Docket No. 16-cv-7820

Dear Judge Forrest:

I am principal of Judd Burstein, P.C., counsel for Defendants in the above-captioned action. I write pursuant to Rule 1.G of Your Honor's Individual Rules of Practice in Civil Cases, to respectfully request a 15-page extension of the 25-page limit applicable to Defendants' Memorandum of Law in Support of their Motion to Dismiss, which we plan to serve this Wednesday, October 19, 2016. This is the first request for a page-limit extension made by Defendants in this case.

This case raises complex issues of, *inter alia*, contract law, copyright law, and this Court's jurisdiction. An additional 15 pages will permit Defendants to raise all the arguments it believes are necessary. Furthermore, the issues of this case are intensely factual. An extension will permit Defendants to discuss the facts of this case in the Memorandum of Law, instead of placing such discussion in an affirmation. This will enhance the readability of Defendants' Memorandum, which will aid the Court in evaluating Defendants' arguments.

An associate attorney in my office, G. William Bartholomew, placed a telephone call to Jay M. Wolman, counsel for Plaintiff, seeking his consent to this request. When he was unable to reach Mr. Wolman on the telephone, Mr. Bartholomew sent a follow-up email explaining that he would need to hear from Mr. Wolman by 4:00 p.m. Eastern Time because Defendants intended to file this letter today. As of this writing, Defendants have not heard back from Mr. Wolman.

Respectfully Yours,

Judd Burstein

cc: Jay M. Wolman, Esq. (via Email)